

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Erin Arneson,

Case Type: Personal Injury
Court File No.:

Plaintiff,

vs.

COMPLAINT

Samuel Bratvold Bolt,

Defendant.

TO: THE ABOVE-NAMED DEFENDANT, AND THE ATTORNEY OF RECORD:

Plaintiff, for her cause of action against the Defendant, states and alleges as follows:

I.

That, Plaintiff Erin Arneson, at all times material and relevant hereto, resided in the City of Elk River, County of Sherburne, State of Minnesota.

II.

That, upon information and belief, at all times material hereto, Defendant Samuel Bolt, resided in the City of Minneapolis, County of Hennepin, State of Minnesota.

III.

That, on or about December 14, 2014, while in the course and scope of her employment as a University of Minnesota Police Officer, Plaintiff Arneson was responding to a white male in distress at Sanford Hall at the University of Minnesota, City of Minneapolis, County of Hennepin, State of Minnesota.

VI.

That Plaintiff Arneson ordered Defendant Bolt to comply with commands. Defendant Bolt refused and Plaintiff Arneson attempted to arrest Defendant Bolt.

EXHIBIT A

V.

Upon information and belief, Defendant Bolt was under the influence of alcohol and/or illicit drugs.

VI.

That, Defendant Bolt owed a duty to Plaintiff Officer Arneson to exercise due care and caution for her safety and to act reasonably and prudently under the circumstances then existing.

VII.

That, at the aforementioned time and place, Defendant Bolt acted in a negligent and careless manner.

VIII.

That, as a direct and proximate result of the aforementioned negligence and carelessness of Defendant Bolt, Plaintiff Arneson was thereby severely and permanently injured in mind and body, and so remains and will permanently suffer great bodily and mental pain.

XI.

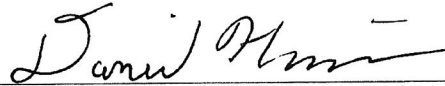
That, by virtue of her injuries, Plaintiff Arneson has incurred large expenses for medical services, including, but not limited to, physician's expenses, medicines, nursing, medical travel expenses, and other medical expenses in endeavoring to cure himself of her injuries, and will incur such expenses in the future, all to her damage in an amount undetermined at this time.

X.

Further, that by virtue of her injuries, Plaintiff Arneson has suffered a loss of earnings and earning capacity and will in the future suffer loss of earnings and earning capacity, all to her damage in an amount undetermined at this time.

WHEREFORE, Plaintiff Arneson demands judgment against Defendant Bolt for a reasonable sum in excess of Fifty Thousand Dollars (\$50,000.00), together with interest, costs and disbursements herein.

Dated: 3/27/20

A handwritten signature in cursive script, appearing to read "Daniel Harrison", written over a horizontal line.

Daniel Harrison (#0400098)

Attorney for Plaintiff

Meuser, Yackley & Rowland, P.A.

10400 Viking Drive, Suite 250

Eden Prairie, MN 55344

(952) 207-2209

ACKNOWLEDGMENT

The undersigned hereby acknowledges that costs, disbursements and reasonable attorney and witness fees may be awarded pursuant to Minn. Stat. § 549.211 to the party against whom the allegations in the pleading are asserted.

Dated: 3/27/20

A handwritten signature in black ink, appearing to read "Daniel Harrison", written over a horizontal line.

Daniel Harrison (#0400098)
Attorney for Plaintiff
Meuser, Yackley & Rowland, P.A.
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